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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,	
Plaintiff,	
v.	
PIROUZ SEDAGHATY,	
Defendant.	

CR 05-60008 HO

**REVISED SECOND MOTION TO
COMPEL THE GOVERNMENT TO
UTILIZE ITS DIPLOMATIC
RESOURCES ON BEHALF OF MR.
SEDAGHATY AND/OR TO ISSUE
LETTERS ROGATORY**

By motion filed January 15, 2010, Mr. Sedaghaty sought an order compelling the government to utilize the MLAT process and/or issue Letters Rogatory on his behalf in order for him to obtain evidence in the Kingdom of Saudi Arabia. The pleading should, rather, have been captioned as stated above, and the request should have been for the Court to order the government to utilize all diplomatic resources at its disposal on behalf of Mr. Sedaghaty or/or to issue Letters Rogatory.

This clarification is necessary because the government is correct in that there is no Mutual Legal Assistance Treaty in place between the United States and the Kingdom of Saudi Arabia. The two countries do, however, enjoy close diplomatic relations and cooperate on numerous issues. The United States government has at its disposal, through diplomatic means, numerous avenues and vehicles to explore in seeking to obtain the assistance of the government of Saudi Arabia in generating the exhibits and the interview and deposition that Mr. Sedaghaty described in the motion filed on January 15, 2010. All the arguments advanced in support of the use of the MLAT process are equally applicable to support use of all other diplomatic means. All of those arguments are incorporated by reference herein.

For the reasons set forth in the motion filed January 15, 2010, this Court should direct the government to assist Mr. Sedaghaty through diplomatic means, issue Letters Rogatory, preclude the government from using the fruits of its diplomatic efforts, or dismiss

the indictment.

Respectfully submitted this 20th day of January, 2010.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Lawrence Matasar
Lawrence Matasar